

1 [Parties and Counsel Listed on Signature Pages]  
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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

7 IN RE: SOCIAL MEDIA ADOLESCENT  
8 ADDICTION/PERSONAL INJURY PRODUCTS  
9 LIABILITY LITIGATION

10 This Document Relates To:

11 ALL ACTIONS

12 MDL No. 3047

13 Case No. 4:22-md-03047-YGR (PHK)

14 **STIPULATION AND [PROPOSED]  
15 ORDER REQUESTING ADDITIONAL  
TIME FOR DISCUSSION AND  
BRIEFING OF PARTIES' SEARCH  
TERMS FOR PLAINTIFFS' DATA**

16 Judge: Hon. Yvonne Gonzalez Rogers

17 Magistrate Judge: Hon. Peter H. Kang

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2 Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby  
3 stipulate and respectfully request that the Court extend the deadline for Personal Injury Plaintiffs and  
4 Defendants to finalize negotiations over case-specific search terms to be run across the bellwether personal  
5 injury plaintiffs' data sources from August 23, 2024, to August 30, 2024, with any necessary letter briefing  
6 to be submitted by September 6, 2024.

7 The parties declare in support of this request:

8 1. Plaintiffs and Defendants have reached agreement on general search terms to be run across  
9 bellwether personal injury plaintiffs' data sources.

10 2. Plaintiffs and Defendants mutually agree that they have made good progress on negotiating  
11 agreement to most case-specific terms, and that they would benefit from more time to continue their  
12 conferrals and attempt to narrow disputes regarding a small number of remaining case-specific search  
13 terms.

14 3. Plaintiffs and Defendants believe that an extension until August 30, 2024, to finalize  
15 negotiations will afford adequate time for such negotiations.

16 4. Plaintiffs agree to run agreed-upon terms (general and case-specific) and continue making  
17 rolling productions of documents while the parties continue negotiations on the other case-specific terms.

18 5. Extending this deadline will not affect any other deadline affixed by the Court.

19 6. This is the second request to extend this deadline.

20 THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully  
21 request that the Court extend the deadline for Plaintiffs and Defendants to finalize case-specific search  
22 term negotiations to August 30 with any necessary letter briefing to be submitted by September 6.

1  
2 Respectfully submitted,

3 Dated: August 23, 2024

/s/ Lexi J. Hazam

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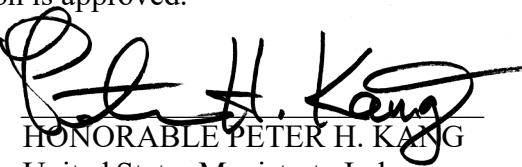
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4 **IT IS SO ORDERED** that the foregoing Stipulation is approved.

5 DATED: August 23, 2024

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7 HONORABLE PETER H. KANG  
8 United States Magistrate Judge

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1 **ATTESTATION**  
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3 I, Gregory L. Halperin, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence  
4 to the filing of this document has been obtained from each signatory hereto.  
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6 Dated: August 23, 2024  
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8 By: /s/ Gregory L. Halperin  
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